

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ELVIS RAMON GREEN BERRIOS, PLAINTIFF v. SIG SAUER, INC DEFENDANT	CIVIL ACTION NO.: 3: 22-CV-01002-JAG CIVIL JURY DEMANDED
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**PLAINTIFF'S INFORMATIVE MOTION AND REQUEST FOR AN ORDER REGARDING
TRANSFER OF THE FIREARM TO U.S. MAINLAND**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Elvis Ramon Green Berrios, though the undersigned attorneys, and respectfully informs, states, and prays as follows:

1. Plaintiff, requested an extension in order to culminate the expert witness inspection of the firearm and the delivery of the expert witness report.
2. The 7 additional depositions were scheduled for February 1 and 2, 2023.
3. As part of our diligent effort to move the Puerto Rico Police Bureau to produce the firearm and deliver it to our expert witness facility in Chicago, Illinois, Brother counsel Ricardo Izurieta visited the Firearm Deposit in the Puerto Rico Police Bureau, once it opened after the Holiday recess. There he talked to the person in charge and explained the process in hand and also indicated that our expert witness with Mr. Timothy Hicks has a FLL license, also, talked to brother counsel Rangel (counsel for Defendant) in order to ask for any help he can provide.
4. Brother counsel Izurieta was informed that only with a Court Order the firearm SIG-SAUER P320 SN 58H014298 CAL. 9MM Black, and the casing recovered at the scene

and analyzed by defendant could be delivered to this address: c/o Mr. Timothy Hicks, Professional Analysis and Consulting, Inc. 4951 Indiana Avenue, Suite 600 Lisle, IL 60532, our expert witness facilities on January 31, 2023.

5. Therefore we, in order to exclude any unreasonable delay and adversity with this process we are Respectfully Requesting an Order for that purpose.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court take notice of this motion and grants the Order requested, in order for Plaintiffs to finish the expert inspection and report to be notified to Defendants.

RESPECTFULLY SUBMITTED.

IT IS HEREBY CERTIFIED: that we have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to all attorneys of record.

In San Juan, Puerto Rico, this 27th day of January of 2023.

DIAZ-IZURIETA LAWFIRM

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